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**DECISION  
AND  
FINDING OF NO SIGNIFICANT IMPACT**

**FOR THE ENVIRONMENTAL ASSESSMENT:**

**"ERADICATION OF INVASIVE SPECIES FOR  
HABITAT RESTORATION ON  
TANGIK, POA, AND SUD ISLANDS, ALASKA"**

**I. INTRODUCTION and BACKGROUND**

The U.S. Fish and Wildlife Service (USFWS) issued an Environmental Assessment<sup>1</sup> (EA) which analyzed the effects of habitat restoration for seabirds on three islands by removing introduced non-native European rabbits (*Oryctolagus cuniculus*) and hoary marmots (*Marmota caligata*) (the preferred alternative) compared to a No Action alternative. This Finding of No Significant Impact (FONSI) documents WS' concurrence and conclusion that our cooperation and participation, at the request and direction of the USFWS, for conducting the proposed action will not have any significant impacts on the quality of the human environment. This FONSI is based on the analysis in the EA.

The need for the project is derived from USFWS mission and policy to conserve island ecosystems and restore native biological diversity on islands where non-native species have become established on the Alaska Maritime National Wildlife Refuge (AMNWR). The AMNWR provides for the conservation of 80% of Alaska's seabird nesting colonies (USFWS 1988). As a result of introduced invasive species on AMNWR islands, there have been negative impacts to native seabirds and plants. The specific purpose of this action is to restore native ecosystems adversely modified by the two species of introduced mammals, European rabbits and hoary marmots. Introduced hoary marmots and European rabbits have adversely modified native ecosystems on three islands where they have been introduced and disturb and compete with burrow-nesting seabirds for breeding sites and by altering native plant communities. Similar negative effects have been recorded on islands throughout the world where non-native species have caused serious ecological damage. Details on the damage and benefits associated with the marmots and European rabbits on the ANMWR islands are provided in the EA. As a result, restoration of natural biological diversity by removing introduced species and preventing additional accidental introductions is a major priority of the AMNWR. AMNWR has identified Tangik, Poa and Sud islands, where hoary marmots and European rabbits occur, for restoration efforts of native island ecosystems.

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services<sup>2</sup> (WS) program receives and responds to requests for assistance from individuals, organizations and agencies experiencing damage and other problems related to wildlife. Wildlife damage management<sup>3</sup> is the alleviation of damage or other

<sup>1</sup> The EA and supporting documentation are available at the USFWS, AMNWR, 95 Sterling Highway, Suite 1 MS 505, Homer, Alaska 99603.

<sup>2</sup> WS is a cooperatively-funded, service-oriented program that only responds to requests from public and private entities to protect resources after an Agreement for Control or other comparable document is signed by the property owner/administrator. WS would assist the USFWS to protect nesting seabirds.

<sup>3</sup> WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage.



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problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 2004).

## II. AGENCY AUTHORITIES

Under various acts of Congress, EOs, and the Code of Federal Regulations (CFR)<sup>4</sup>, USFWS is authorized and directed to conserve, protect, and enhance the nation's fish and wildlife resources and their habitats. APHIS-WS is authorized by Congress to reduce damage caused by wildlife in cooperation with other agencies. USFWS will obtain all necessary permits and conduct any necessary consultations prior to conducting eradication activities. All take under permits will be reported in accordance with federal or State laws.

The *Fish and Wildlife Act of 1956* (16 U.S.C. 742a-742j, not including 742 d-1, 70 Stat. 1119), as amended, provides general guidance which can be interpreted to include invasive species control that requires the Secretary of the Interior to take steps "required for the development, management, advancement, conservation, and protection of fish and wildlife resources."

The *National Wildlife Refuge System Administration Act of 1966* (16 U.S.C. 668dd-668ee) - This Act, derived from sections 4 and 5 of Public Law 89-669 (October 15, 1966; 80 Stat. 927), constitutes an "organic act" for the National Wildlife Refuge System. It was recently amended by P.L. 105-57, "The National Wildlife Refuge System Improvement Act of 1997." (see below).

The *National Wildlife Refuge System Improvement Act of 1997* states the Secretary shall—(A) Provide for the conservation of fish, wildlife, and plants, and their habitats within the System; (B) ensure that the biological integrity, diversity, and environmental health of the System." This direction was clarified in 601 FW 3 (2001) the "Integrity policy" (see below)

The *USFWS policy for maintaining biological integrity and diversity and environmental health (601 FW 3, 2001)*, directs refuges to "prevent the introduction of invasive species, detect and control populations of invasive species, and provide for restoration of native species and habitat conditions in invaded ecosystems" and directs refuge managers to "develop integrated pest management strategies that incorporate the most effective combination of mechanical, chemical, biological, and cultural controls while considering the effects on environmental health."

The *Alaska National Interest Lands Conservation Act of 1980 (ANILCA)* established the AMNWR in its current form and directs the refuge: "*To conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to marine mammals, marine birds and other migratory birds, [and] the marine resources upon which they rely...*" This is the basis for proposing to restore natural diversity, particularly for marine birds (i.e., seabirds).

*Animal Damage Control Act (7 USC 426-426c)*. The Act of March 2, 1931 as amended (46 Stat. 1486; 7 U.S.C. 426-426c)], the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988 (Public law 100-102, Dec. 22, 1987, Stat. 1329-1331; 7 U.S.C. 426c) is the primary statutory authority for the APHIS-WS program which authorized APHIS-WS to reduce damage caused by wildlife in cooperation with other agencies. This guidance is implemented through Agreements for Control or other appropriate agreements (such as Memorandums of Understandings) which are established with government or private entities.

*Presidential EO 13112 on Invasive Species*<sup>5</sup> provides general guidance to federal agencies relative to invasive species. Section 2(a)(2), states: "Each Federal agency whose actions may affect the status of

<sup>4</sup> A more complete list of the more pertinent Acts and EOs is listed in the EA.

<sup>5</sup> Executive Order 13112 defines "invasive species" as an alien species (a species that is not native with respect to a particular ecosystem) whose introduction does or is likely to cause economic or environmental harm or harm to human health.



invasive species shall, to the extent practicable and permitted by law, subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them.”

### III. AFFECTED ENVIRONMENTS

Tangik<sup>6</sup> and Poa are two small islands located in the Krenitzin Islands of the eastern Aleutian Islands. These two islands were used historically by the Aleut (Unanagan) people, but humans have not lived on the Islands for at least 50. Tangik is 52 acres and 220 ft in elevation while Poa is 134 acres and 300 ft in elevation. Sud Island is part of the Barren Islands and located at the southern entrance to Cook Inlet and is about 275 acres, with the highest elevation being approximately 890 feet at the southwestern end.

### IV. ISSUES ANALYZED IN THE EA

The following issues were identified as important to the scope of the analysis (40 CFR 1508.25) and each of the alternatives was evaluated relative to its impacts on these issues.

- Efficacy of Eradication – Can the Proposed Action achieve the goal of eradication?
- Impacts to Birds – What are the anticipated impacts on bird species?
- Impacts to Non-target Mammal Populations - What are the anticipated impacts on non-target species?
- Impacts to Threatened and Endangered Species – What are the anticipated impacts on Threatened and Endangered species?
- Cultural Impacts – What are the anticipated impacts on cultural uses and heritage?

### V. ALTERNATIVES ANALYZED IN DETAIL

As indicated above, the alternatives analyzed in the EA were the No Action Alternative and the Preferred Alternative. An analysis of the effects of each Alternative on the issues is discussed in the EA. All USFWS and WS management actions comply with all federal and all applicable state, and local laws. The two alternatives developed and analyzed in detail are:

**Alternative A:** European Rabbits and Hoary Marmots will not be Eradicated from Tangik, Poa, and Sud Islands (No Action<sup>7</sup>). Under this alternative, European rabbits and hoary marmots would not be eradicated from the Islands or managed in any manner. Other ongoing invasive species management programs in the Aleutians, including rat and fox eradication programs, would be maintained based on previous refuge management decisions.

**Alternative B:** Eradication of European Rabbits from Tangik and Poa islands, and Hoary Marmots from Sud Island (Proposed Action). Under this alternative, European rabbits and hoary marmots would be eradicated from the Islands. The EA evaluated the impacts of eradicating introduced European rabbits and hoary marmots using mechanical capture methods and shooting<sup>8</sup>.

### V. MONITORING

<sup>6</sup> Tangik Island is currently being removed from the proposed action; however the analysis in the EA remains valid. Before any action is conducted on Tangik Island, the EA will be reviewed and would be supplemented, if appropriate.

<sup>7</sup> Analysis under the No Action alternative is required under NEPA (40 CFR 1502) and is consistent with CEQ (1981).

<sup>8</sup> Eradication of rabbits and marmots would be conducted late winter through summer. Toxicants are not proposed for use on these projects.



The USFWS will monitor the Islands during and after operations to assess eradication activities and effectiveness. Teams will re-visit the Islands once a year for the 2-years following the project's completion. If any rabbits or marmots are found during visits, methods described in the EA will be re-employed to complete the eradications. Monitoring will be designed for burrow-nesting seabirds on the Islands.

## **VI. PUBLIC INVOLVEMENT**

Public comments for this project were solicited during initial scoping (which started November 12, 2009), and continued through administrative review (beginning December 9, 2009) and public comment on the EA (January 9 through February 10, 2010).

The administrative review process included sending an early working draft of the EA to subject-matter experts and to administrators within the USFWS and Alaska Department of Fish and Game. Comments from the administrative review were incorporated into the EA that was then released for a 30-day public comment period.

A notice of availability was emailed directly to 200 agencies, organizations, and individuals and to four list serves. Press releases went out statewide through a list serve maintained in the USFWS regional office and were also sent to local newspapers and radio stations near project areas. In addition, printed copies of the EA were distributed to local libraries, Native corporation offices, and to other interested parties. An interview with the refuge manager was aired statewide on Alaska Public Radio Network, and the refuge invasive species biologist gave a presentation on the project to a conservation organization.

During the public comment period, we received 16 responses; 9 from individuals, 4 from professional scientific organizations, 2 from conservation organizations, and 1 from a governmental agency. Of the 16 responses (13 written and 3 verbal), 14 were in support of the proposed action, 1 respondent was opposed, and 1 respondent proposed to conduct more research at Tangik and Poa on the effects of European rabbits on burrow-nesting seabirds before determining whether to proceed with the Preferred Alternative. Based on the public comments received, the effects of the proposed project on the quality of the human environment are not highly controversial or significant.

## **VII. DECISION and RATIONALE**


I have carefully reviewed the EA and the input resulting from the EA review process. The analysis in the EA indicates that the proposed project is not a major federal action that would significantly affect the quality of the human environment as defined in Section 102 (2) c of the National Environmental Policy Act of 1969. I believe the issues identified in the EA are best addressed by cooperating with the USFWS and also selecting Alternative B: (Eradication of European Rabbits from Tangik and Poa islands, and Hoary Marmots from Sud Island (Proposed Action) and applying the associated standard operating procedures and mitigation measures discussed in Chapter 2 of the EA. Alternative B provides: 1) the best range of practical and effective damage management methods, 2) has low impacts on target and non-target species, 3) provides safeguards for public safety, 4) allows the USFWS to meet its regulatory obligations, and 5) addresses the issues. I have also adopted the EA as final because no comments from the public were received to change the analysis.

## **FINDING OF NO SIGNIFICANT IMPACT**

The EA indicates that there will not be significant impacts, individually or cumulatively, on the quality of the human environment because of the proposed action, and that these actions do not constitute a major federal action. I agree with this conclusion and therefore determine that an EIS will not be necessary or prepared. This determination is based on the following factors:

1. The Proposed Action, as conducted on the AMNWR is not regional or national in scope.
2. The Proposed Action will not significantly affect public health and safety.
3. The effects on the quality of the human environment are not highly controversial. Although there may be some opposition to government-sponsored damage management, this action is not controversial in relation to size, nature, or effects.
4. Standard operating procedures adopted as part of the proposed action lessen risks to the public, prevent adverse effects on the human environment and reduce uncertainty and risks.
5. The proposed action does not establish precedence for future actions with significant effects. This action would not set precedent for additional WS damage management that may be implemented or planned in the AMNWR.
6. The number of animals taken annually is very small in comparison to total populations. Adverse effects on wildlife or wildlife habitats are minimal.
7. The Proposed Action would not affect park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas. The proposed action also does not affect districts, sites, highways, structures or objects listed in or eligible for listing in the National Register of Historic Places, nor would it cause a loss or destruction of significant scientific, cultural, or historical resources.
8. An evaluation of the Proposed Action and its effects on federally listed T&E species determined that no significant adverse effects would be created for these species. The proposed action complies fully with the Endangered Species Act of 1973, as amended. An intraagency consultation regarding potential risks to T&E species has been conducted.
9. This action would be in compliance with federal, Alaska and local laws or requirements for invasive species management and environmental protection.
10. No significant cumulative effects were identified by this assessment or other actions implemented or planned within the analysis area.

For additional information regarding this FONSI, please contact Roger Woodruff, State Director, APHIS-WS, 720 O'Leary St NE, Olympia, WA 98502.

  
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Jeffrey S. Green  
Western Regional Director  
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2/25/10  
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Date

## LITERATURE CITED IN THE DECISION

CEQ. 1981. Forty most asked questions concerning CEQ's National Environmental Policy Act regulations. (40 CFR 1500-1508) Fed. Reg. 46(55):18026-18038.

The Wildlife Society. 2004. TWS Position statement on wildlife damage management. The Wildlife Society, Bethesda, Md. 1 pp.

USFWS (U.S. Fish and Wildlife Service). 1988. Alaska Maritime National Wildlife Refuge Final Comprehensive Conservation Plan, Wilderness Review and Environmental Impact Statement. Anchorage, AK.